REMARKS

By this response, Applicants have not amended the claims. As a result, claims 26-50 remain pending in this application. Reconsideration in view of the following remarks is respectfully requested.

Initially, the Office issued an Office Action dated December 1, 2005. In the Office Action, Applicants' representative noted that page 9 of the Office Action indicated that the Office Action was a Final Office Action while the Office Action summary indicated that it was a non-final Office Action. During a telephone interview with the Examiner on or about February 27th, the Examiner indicated that the Office Action was a Final Office Action and that the summary sheet was in error. As a result, the Examiner agreed to withdraw the previous Office Action and issue a new one. The Office mailed the new Final Office Action on March 14, 2006.

I. Rejection of claims 26-27, 30, 34-35, 38, and 41-42

In the Final Office Action, the Office rejects claims 26-27, 30, 34-35, 38, and 41-42 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,216,212 (Challenger). Interpreting Challenger only for the purposes of this response, since the Office has failed to show that Challenger discloses each and every feature of the claimed invention as required by 35 U.S.C. § 102(e), Applicants again respectfully request withdrawal of the rejections of claims 26-27, 30, 34-35, 38, and 41-42 as allegedly being anticipated by Challenger.

A.   With respect to claim 26, the Office cites col. 8, lines 30-42 of Challenger as allegedly disclosing the claimed managing a set of object links that interfaces with the abstraction layer, wherein each object link comprises a source content object for a source website, a target content

object for a destination website different from the source website, and one of a plurality of object link types. Additionally, in response to Applicants' previous amendments and arguments presented therewith, the Office states that "Challenger clearly taught updating a target content object with a source content object of a different website, as the reference was directed towards 'constructing and maintaining objects to associate changes in remote data with cached objects' (see column 2, lines 58-65), the sources comprising web pages on a remove (sic) server and the target comprising a caching server (see column 3, lines 30-35; see column 7, lines 26-37; column 8, lines 30-43)." Final Office Action, page 8.

     1. Initially, Applicants note that data and/or servers that are remote from one another fail to disclose different websites. In particular, a "caching server", to the extent that it is disclosed by Challenger, does not comprise a website different from a source website. In sharp contrast, as expressly stated in Challenger, a "server 100 uses the caches 2 to improve performance and lessen the CPU time for satisfying the client 90 requests." Challenger, col. 7, lines 30-32. To this extent, the server can be a proxy server. Challenger, col. 7, lines 41-44; col. 1, lines 65-66. As is known in the art, a proxy server acts on behalf of another server and a client. Commonly, the proxy server caches web pages of a website being served by the server so that the web pages can be provided to the client faster. See, e.g., TechEncyclopedia definition for "proxy server" available at www.techweb.com/encyclopedia/. As a result, contrary to the Office's assertion, data and/or servers that are remote from one another do not disclose different websites. In fact, Challenger expressly states that the server can comprise a proxy server, which by definition is providing web pages for the same website on behalf of another server.

2. Additionally, Applicants note that Challenger's use of the term "cache" clearly denotes that the data at the two locations is for the same website. As is known in the art, a cache comprises a copy of source data, which is used to speed up data transfer. See, e.g., definition for "cache" available at www.techweb.com/encyclopedia/. In operation, a request is made for the source data, but rather than retrieving the source data, data from the cache is retrieved and provided in response to the request. To be effective, the cache should comprise an exact copy of the source data so that the correct data is provided.

In sharp contrast, the claimed invention manages a set of object links..., wherein each object link comprises a source content object for a source website, a target content object for a destination website different from the source website, and one of a plurality of object link types. Since the source content object and target content object in the claimed invention are for different websites, a request for one (e.g., the source content object) is distinct from a request for the other (e.g., the target content object). To this extent, a proxy server would not provide the target content object in response to a request for the source content object, or vice versa. Similarly, the target content object would not be stored in a cache for the source content object since the content objects are distinct from one another.

3. Additionally, Applicants note that Challenger fails to disclose an object link that includes one of a plurality of object link types. In sharp contrast, Challenger only states that "[t]he cache manager 1 can determine which complex objects have changed by examining edges in G (see FIG. 11)." Challenger, col. 8, lines 40-42. Nowhere in Challenger is it disclosed that these edges, or anything relating to the claimed object links, comprise one of a plurality of object

link types. To the contrary, throughout the discussion, Challenger implies that these edges are all the same, merely indicating the dependence of one object on another object.

B.   With further respect to clam 26, the Office cites col. 8, lines 3-10 of Challenger as allegedly disclosing the claimed managing an abstraction layer that organizes data for a plurality of content objects. This portion of Challenger discusses a cache manager that keeps track of dependencies of a cached object. Applicants note that this is unrelated to the claimed organizing data for a plurality of content objects. In particular, organizing data for a plurality of content objects includes arranging the data according to a principle or plan. In sharp contrast, the cited portion of Challenger does not arrange data, but rather manages dependencies of cached objects.

C.   With further respect to claim 26, the Office cites col. 14, lines 58-63 of Challenger as allegedly disclosing the claimed abstraction layer that defines a unique path for locating the data for each of the plurality of content objects regardless of the corresponding resource type and a corresponding file system used to store each content object. Additionally, in response to Applicants' previous amendments and arguments presented therewith, the Office states that "Challenger teaches an abstraction layer that clearly defines a unique path for locating data for each of the plurality of content objects, as Challenger disclosed an object dependence graph defining unique dependencies between objects and their associated data (see column 6, lines 40-56; column 15, lines 3-10)." Final Office Action, page 8.

        1. Initially, Applicants note that the text of col. 14, lines 58-63 of Challenger is nearly identical to that of col. 8, lines 30-42, which is cited as allegedly disclosing one or more features of the claimed set of object links. To this extent, the claimed abstraction layer provides a completely different function from that of the claimed set of object links. As a result, Applicants

respectfully submit that highly similar text found in two locations of the same reference cannot disclose both of the claimed features. However, should the Office maintain this rejection, Applicants respectfully request clarification of the Office's interpretation of these portions of Challenger and the claimed features.

2. Regardless, these portions of Challenger discuss managing the underlying data structures that represent object dependence graphs. As stated in Challenger, an object dependence graph includes vertices known as graph objects and edges between the graph objects. The edges indicate a data dependence between two objects. "These graph objects do not correspond to actual data. They are used as a convenience for propagating data dependencies." Challenger, col. 6, lines 40-56. Applicants respectfully submit that since the graph objects do not correspond to actual data, the object dependence graph necessarily does not correspond to actual data, and therefore cannot disclose the claimed defining a unique path for locating the data. Additionally, data dependence information is unrelated to the claimed unique path for locating data. To this extent, the cited portion of Challenger clearly fails to disclose the claimed abstraction layer that defines a unique path for locating the data for each of the plurality of content objects regardless of the corresponding resource type and a corresponding file system used to store each content object.

In view of each of the above-stated reasons, either alone or in combination, Applicants respectfully submit that the Office has failed to present a *prima facie* case that Challenger discloses the claimed invention. As a result, Applicants respectfully request withdrawal of the rejection of claim 26 and claims 27, 30, and 34-35, which depend therefrom, as allegedly being anticipated by Challenger.

D.   With respect to claim 38, Applicants note that claim 38 includes similar features as those included in claim 26. To this extent, Applicants herein incorporate the various arguments presented above with respect to claim 26. As a result, Applicants respectfully request withdrawal of the rejection of claim 38 and claims 41-42, which depend therefrom, as allegedly being anticipated by Challenger.

II. Rejection of claims 28-29, 31-33, and 43-44

Further, the Office rejects claims 28-29, 31-33, and 43-44 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Challenger in view of U.S. Patent No. 6,623,529 (Lakritz). Applicants note that the Office relies on its interpretation of Challenger with respect to claims 26 and 38, from one of which each of these claims depend. To this extent, Applicants herein incorporate the various arguments presented above with respect to claims 26 and 38. Further, Applicants note that the combination of Challenger with Lakritz, even if, *arguendo*, appropriate, fails to address the deficiencies of Challenger discussed above with respect to claims 26 and 38. In light of these arguments, Applicants respectfully submit that the Office has failed to present a *prima facie* case of obviousness since, *inter alia*, the cited references do not teach or suggest all of the features of the claimed invention. As a result, Applicants respectfully request withdrawal of the rejection of claims 28-29, 31-33, and 43-44 as allegedly being unpatentable over Challenger in view of Lakritz.

III. Rejection of claims 36-37, 39-40, and 45-50

Further, the Office rejects claims 36-37, 39-40, and 45-50 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Challenger in view of Lakritz.

A.   With respect to claim 45, Applicants note that the Office relies on its previous

interpretation of Challenger as allegedly teaching the claimed object links. To this extent,

Applicants herein incorporate the arguments presented above with respect to claim 26 and its

claimed object links (I, A, 1-3). Further, Applicants note that the combination of Challenger

with Lakritz, even if, *arguendo*, appropriate, fails to address this deficiency of Challenger.

B.   With further respect to claim 45, the Office cites col. 10, lines 40-65 of Lakritz as

allegedly disclosing the claimed means for managing a set of projects, wherein each project

comprises a set of content objects for a unique website; and means for managing a set of project

links, wherein each project link defines an update relationship between a source project and a

target project and wherein each project link comprises one of a plurality of project link types. In

particular, the Office states that "Lakritz disclosed a method and system for translating a source

content object into another language for a target content object, the translation of several objects

handled by project links". Final Office Action, page 7. Additionally, in response to arguments

previously presented by Applicants, the Office maintains the rejection since Lakritz allegedly

"disclosed that job tickets and work packets defined the update tasks to be performed between a

source of documents and a set of target completed documents on a web site for a project (see

column 10, line 40 through column 11, line 13)." Final Office Action, pp. 8-9.

        1. Initially, Applicants note that the Office's own interpretation of Lakritz does not

support its rejection of the claimed invention. For example, the Office states that Lakritz teaches

that job tickets and work packets define update tasks... for a project. Even if, *arguendo*, this is

an accurate interpretation of Lakritz, such a teaching clearly fails to teach or suggest the claimed

invention. In particular, the claimed invention comprises project links that define an update

relationship between a source project and a target project. As such, each project link includes information on two projects, a source project and a target project. However, as stated by the Office, Lakritz only discloses a single project that includes update tasks.

2. Further, the Office fails to address other features of the claimed invention. For example, the claimed invention includes means for automatically generating a new object link based on one of the set of project links, a new source content object, and a new target content object. In particular, when a new source content object is created for a source project, a new target content object is generated for a target project based on one of the set of project links. A new object link is also automatically generated based on the project link, the new source content object and the new target content object. The Office fails to cite any portion of Lakritz that allegedly discloses this claimed feature. Additionally, Applicants respectfully submit that such a feature is not taught or suggested by Lakritz.

In view of each of the above-stated reasons, either alone or in combination, Applicants respectfully submit that the Office has failed to present a *prima facie* case that the combination of Challenger and Lakritz teaches or suggests the claimed invention. As a result, Applicants again respectfully request withdrawal of the rejection of claim 45, and claims 46-50, which depend therefrom, as allegedly being obvious in view of the combination of Challenger and Lakritz.

C.   With respect to claims 36-37 and 39-40, Applicants note that the Office relies on its interpretation of Challenger with respect to claims 26 and 38, from one of which each of these claims depend. To this extent, Applicants herein incorporate the various arguments presented above with respect to claims 26 and 38. Further, Applicants note that the combination of

Challenger with Lakritz, even if, *arguendo*, appropriate, fails to address the deficiencies of Challenger discussed above with respect to claims 26 and 38. In light of these arguments, Applicants respectfully submit that the Office has failed to present a *prima facie* case of obviousness since, *inter alia*, the cited references do not teach or suggest all of the features of the claimed invention. As a result, Applicants respectfully request withdrawal of the rejection of claims 36-37 and 39-40 as allegedly being unpatentable over Challenger in view of Lakritz.

D.   With further respect to claims 36-37, 39-40, and 45-50, Applicants respectfully submit that the Office has failed to present a *prima facie* case for the combination of Challenger with Lakritz. In particular, the Office alleges that one would be motivated to combine Challenger with Lakritz to provide "a more compact, efficient, and easy way to provide document localization". Final Office Action, p. 7. However, Applicants note that including document localization in Challenger goes against the express teachings of Challenger. In particular, as discussed above (I, A), Challenger discusses a cache. As is known in the art, a cache ideally comprises an exact copy of other data, which is used to speed data transfers. To this extent, the inclusion of any localization functionality in Challenger would result in a cache that is not an exact copy. In this manner, the express teachings of Challenger are violated by the Office's proposed inclusion of Lakritz. As a result, Applicants respectfully request withdrawal of the rejection of claims 36-37, 39-40, and 45-50 as allegedly being unpatentable over Challenger in view of Lakritz.
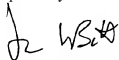
IV. Conclusion

Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's

interpretation of the claimed subject matter or the references used in rejecting the claimed

subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and

modifications of the various references or the motives cited for such combinations and

modifications. These features and the appropriateness of the Office's combinations and

modifications have not been separately addressed herein for brevity. However, Applicants

reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for

allowance. Should the Examiner require anything further to place the application in better

condition for allowance, the Examiner is invited to contact Applicants' undersigned

representative at the number listed below.

Respectfully submitted,

John W. LaBatt, Reg. No. 48,301   Dated: May 12, 2006
Hoffman, Warnick & D'Alessandro LLC
75 State Street, 14th Floor
Albany, NY 12207
(518) 449-0044 - Telephone
(518) 449-0047 - Facsimile